Herman Maestas
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July 13,1996

Mr. William Knoll
Department of the Navy
NAVSEA Code 08U
2531 Jefferson Davis Highway
Arlington, VA 22242-5160

Dear Mr. Knoll:

Thank you for sending me a copy of the Navy Draft Environmental Impact Statement for a Container System for the Management of Naval Spent Nuclear Fuel. I have read the document and have the following comments.

A I support the temporary dry storage of Naval spent nuclear fuel in Idaho. As a Westinghouse employee who works at the Naval Reactors Facility Expended Core Facility, I feel that we have the correct expertise and facilities to correctly package the naval fuel for dry storage. I feel that this should be done in either the dual-purpose or multi-purpose canisters. To minimize the cost of shipments between the Expended Core

B Facility and other areas, I feel that the temporary dry storage of the loaded canisters should be at the Naval Reactors Facility until they are transferred to the National Repository for final disposition..

C I do not think that plans to build a separate storage facility which is not located over the Snake River Plain aquifer should be pursued. I feel that all this option will do is create another facility that will need to be remediated in the future. I also feel that this facility will also incur more expense to the tax payers as its infrastructure (roads, security requirements, utilities, radiological monitoring requirements) will duplicate those already in place at the Naval Reactors Facility. In addition, building a storage facility which is not located over the aquifer will place the facility closer to the earthquake faults in the area which would appear to incur more risk than dry storage within the current Naval Reactors Facility perimeter.

D I also support the use of either the dual-purpose or multi-purpose canisters to package special case wastes (greater than Class C wastes) for temporary dry storage the Naval Reactors Facility until transferred to the National Repository for final disposition.

As a Westinghouse employee, I would like to state that the above comments are written to express my personnel opinion.

Thank you for the opportunity to comment on this pressing and very important issue.

Sincerely yours,

Herman J. Maestas

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Commenter: Herman Maestas, Idaho

Response to Comments:

A.&D. In Chapter 3, Section 3.8, Comparison of Alternatives, the EIS states that the impacts for most categories are small or nonexistent for all alternatives. Since 1957, the Navy has safely shipped over 660 containers of spent nuclear fuel from the shipyards and prototype sites to the Naval Reactors Facility. All of the shipments were made safely by rail and without release of radioactivity. Since any container alternative selected for dry storage and transportation (either by rail, heavy-haul truck, or a combination of both) must meet the requirements of 10 CFR Part 71, Packaging and Transportation of Radioactive Material, and 10 CFR Part 72, Licensing Requirements for the Independent Storage of Spent Nuclear Fuel and High-Level Waste, other containers can also be used safely and reliably.

B.&C. In Appendix A, Section A.2.4, Analysis Results: Normal Operations, the EIS shows that the radiological impacts for dry storage are small at all of the locations evaluated. The commenter is correct that costs will be greater if shipments between the Expended Core Facility and other areas are required. In addition, Chapter 5 and Appendix F of the EIS discuss the increased environmental impacts, including seismic concerns, associated with placing a dry storage facility at undeveloped locations. The preferred alternative, described in Chapter 3, Section 3.9 does not include construction of a dry storage area at the locations originally thought to be removed from above the Snake River Plain Aquifer, partly because the hydrologic connection of these locations to the Aquifer removes any advantage they might have presented.

D. See the response to Comment A above.